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23 Attorneys for Plaintiff  
24 KIRK LONG

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA

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18 KIRK LONG, individually, on behalf of all ) CASE NO.: C 07 2746 MJJ  
19 others similarly situated, and on behalf of the )  
20 general public, ) STIPULATION AND [PROPOSED]  
21 Plaintiff, ) ORDER GRANTING DEFENDANT  
22 v. ) AN EXTENSION TO AUGUST 2, 2007  
23 SAFECO INSURANCE COMPANY OF ) TO RESPOND TO COMPLAINT AND  
24 AMERICA, ) FOR TOLLING  
25 Defendant. )  
26 ) Complaint Filed: May 24, 2007

27 WHEREAS, on May 24, 2007, Plaintiff filed this action on behalf of himself and a  
28 proposed Fair Labor Standards Act Collective Class ("FLSA Putative Class") and California  
Rule 23 Class of Safeco Field Examiners; and

1 WHEREAS, Plaintiff served Defendant with the Complaint on June 15, 2007; and  
 2 WHEREAS, Defendant has requested an additional 28 days to investigate the allegations  
 3 of the Complaint to competently respond to the sixty (60) paragraphs of allegations regarding  
 4 current and former employees around the country;

5 WHEREAS, in exchange for an extension of time to file a responsive pleading to the  
 6 Complaint, Plaintiff has requested that the statute of limitations for the FLSA Putative Class be  
 7 tolled for a period of 28 days;

8 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the  
 9 parties, through their attorneys, that Defendant shall have until August 2, 2007 to file a  
 10 responsive pleading to the Complaint, and that the applicable statutes of limitations or other  
 11 deadlines for the filing of claims or consents to sue by the members of the FLSA Putative Class  
 12 are tolled for a period of 28 days, from July 5, 2007 until August 2, 2007.

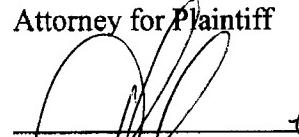
13  
 14 Dated: July 5, 2007




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Peter Rukin  
Attorney for Plaintiff

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 16 Dated: July 6, 2007




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Fred W. Alvarez  
Attorney for Defendant

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 20 Good Cause appearing, it is APPROVED and IT IS SO ORDERED

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 22 Dated: July 9, 2007




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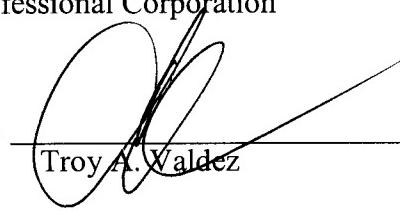
Martin J. Jenkins  
Honorable Martin J. Jenkins  
United States District Court Judge

1 I, Troy A. Valdez, am the ECF User whose identification and password are being  
2 used to file this STIPULATION AND [PROPOSED] ORDER GRANTING DEFENDANT AN  
3 EXTENSION TO AUGUST 2, 2007 TO RESPOND TO COMPLAINT. I hereby attest that  
4 Peter Rukin has concurred in this filing.

5 Dated: July 6, 2007

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

6 By:

  
Troy A. Valdez

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9 Attorneys for Defendant  
10 SAFECO INSURANCE COMPANY  
11 OF AMERICA

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